

**21-UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK**

Phillips, et al.,

Plaintiffs,

v.

The City of New York, et al.,

Defendants.

21-cv-8149 (ALC) (SLC)

**REPLY DECLARATION OF
KATHRYN TEWSON**

I, Kathryn Tewson, declare:

1. As set out in my prior declaration, I am making this declaration as an OSINT investigator, explaining findings after looking into Renan Beauchard.

2. I understand that the lawyer for the City of New York has suggested that the email address may be stale.

3. As part of the investigation into the email address rbeauchard96@gmail.com performed for my March 4, 2024 declaration, I used an open-source tool called GHunt. The source code for GHunt is publicly available at <https://github.com/mxrch/GHunt>. This tool is widely used by OSINT investigators and is generally considered to be accurate and reliable.

4. As part of its function, GHunt queries the Google API and returns all public-facing information associated with a specific gmail address. This includes, *inter alia*, the display name and Google Reviews profile URL associated with the account as well as the “last profile edit” – the most recent time the account was accessed by the user.

5. The GHunt results for the email account rbeauchard96@gmail.com indicate that this account was last accessed on February 24, 2024 at 1:08 PM UTC¹. A true and correct screenshot of the portion of these results showing the “last profile edit” value is below. I have added a red box to indicate the relevant information for clarity.

```
[+] Stored session loaded !  
[+] Authenticated !  
  
👤 Google Account data  
  
Name : Renan Beauchard  
  
[-] Default profile picture  
[-] Default cover picture  
  
Last profile edit : 2024/02/24 13:08:10 (UTC)  
  
Email : rbeauchard96@gmail.com  
Gaia ID : 117600850431455408120
```

6. Based on the recency of this value, I can conclude that this email address is currently being used with a reasonable degree of professional certainty.

I declare, under penalty of perjury, that the statements above are true and correct.

Executed On: March 6, 2024


Kathryn Tewson

¹ “UTC” is a time zone reference to the Universal Time Zone; it is equivalent to Greenwich Mean Time (GMT). 1:08 PM UTC is 8:08 AM Eastern Time on the same day.